

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: BRAZOS ELECTRIC POWER COOPERATIVE, INC., ¹ Debtor.	Chapter 11 Case No. 21-30725 (DRJ)
BRAZOS ELECTRIC POWER COOPERATIVE, INC., <i>et al.</i> , ² Plaintiffs, v. ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC., <i>et al.</i> , ³ Defendants.	Adv. Proc. No. 21-03863 (DRJ)

**ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC. AND DEFENDANT
INTERVENORS' SECOND AMENDED OBJECTIONS TO BRAZOS ELECTRIC
POWER COOPERATIVE, INC. AND THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS' SECOND AMENDED EXHIBIT LIST**

¹ The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is: Brazos Electric Power Cooperative, Inc. (4729). Additional information regarding this case may be obtained on the website of the Debtor's proposed claims and noticing agent at <http://cases.stretto.com/Brazos>. The Debtor's address is 7616 Bagby Avenue, Waco, TX 76712.

² The Plaintiff-Intervenors in this Adversary Proceeding are: the Official Committee of Unsecured Creditors, Mid-South Electric Cooperative Association; Denton County Electric Cooperative, Inc., d/b/a CoServ Electric; United Electric Cooperative Services, Inc., d/b/a United Cooperative Services; Tri-County Electric Cooperative, Inc.; Bartlett Electric Cooperative, Inc.; Comanche County Electric Cooperative Association; Cooke County Electric Cooperative Association, Inc. d/b/a PenTex Energy; Hamilton County Electric Cooperative Association; Heart of Texas Electric Cooperative, Inc.; J-A-C Electric Cooperative, Inc.; Navasota Valley Electric Cooperative, Inc.; and Wise Electric Cooperative, Inc.

³ The Defendant-Intervenors in this Adversary Proceeding are: Calpine Corporation; Tenaska Power Services Co.; NRG Energy, Inc.; ENGIE Energy Marketing NA, Inc.; Talen Energy Supply, LLC; Golden Spread Electric Cooperative, Inc.; South Texas Electric Cooperative; and NextEra Energy Marketing, LLC.

To: Brazos Electric Power Cooperative, Inc., by and through one of its attorneys of record, Paul Trahan, Norton Rose Fulbright US LLP, 98 San Jacinto Boulevard, Suite 1100, Austin, Texas 78701, paul.trahan@nortonrosefulbright.com

To: Plaintiff-Intervenor Official Committee of Unsecured Creditors, by and through one of its attorneys of record, John F. Higgins, Porter Hedges LLP, 1000 Main Street, 36th Floor, Houston, Texas 77002-2764, jhiggins@porterhedges.com

Electric Reliability Council of Texas, Inc. (“ERCOT”), together with Calpine Corporation, on behalf of itself and each of its affiliates, including but not limited to Calpine Energy Services, L.P., Calpine Energy Solutions, LLC, and Cavallo Energy Texas, LLC (collectively, “Calpine”); NRG Energy, Inc., on behalf of itself and certain of its intervening affiliates (collectively, “NRG”); ENGIE Energy Marketing NA, Inc., on behalf of itself and certain of its intervening affiliates (collectively, “ENGIE”); Talen Energy Supply, LLC, on behalf of itself and each of its affiliates, including but not limited to Talen Energy Marketing, LLC (collectively “Talen”); NextEra Energy Marketing, LLC (“NEM”); South Texas Electric Cooperative, Inc. (“STEC”); and Tenaska Power Services Co. (“TPS”) (together with STEC, NEM, Talen, ENGIE, NRG and Calpine, the “Defendant Intervenor”), provide the following objections to Brazos Electric Power Cooperative, Inc. (“Brazos”) and the Official Committee of Unsecured Creditors’ (the “Committee”) Second Amended Exhibit List [Dkt. No. 431] pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure:

A. Objections to Brazos and the Committee’s Second Amended Exhibit List

ERCOT and the Defendant Intervenor’s second amended objections to Brazos and the Committee’s proposed trial exhibits is attached hereto as **Exhibit A**.

Dated: February 19, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on February 19, 2022, I caused a copy of the foregoing document to be served via CM/ECF on all counsel of record in this matter.

/s/ Jamil N. Alibhai
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